

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PLAINTIFF,

v.

DEFENDANT,

) 04-1205-slr

) CIVIL ACTION NO. 04- 941-SLR 04-1205-sl

) CIVIL ACTION 04-941-SLR

) CIVIL ACTION 04-1205-SLR

MOTION FOR APPOINTMENT OF COUNSEL

COMES NOW, THE Plaintiff, JEFFERY A. SIMS Pro-Se and moves this Honorable Court for Appointment of Counsel, to represent Plaintiff.

In support of this Motion Plaintiff states that the following is true and correct, to the best of his knowledge and belief:

1. Plaintiff is incarcerated.
2. Plaintiff is unskilled in the law.
3. The administration at the Delaware Correctional Center where the Plaintiff is held limits the days and times that Plaintiff is allowed access to the law library.
4. Knowing that there will be testimony from witnesses, and expert testimony, which will put the Pro-Se Litigant at a considerable disadvantage.
5. Appointment of Counsel would serve "the best interests of justice" in this case.

WHEREFORE, Plaintiff prays this Honorable Court appoint counsel to represent the Plaintiff.

DATE: JULY 26-2005

Jeffery A. Sims S.B.I. 198625
Delaware Correctional Center
Smyrna, DE 19977

FILED

AUG 10 2005

U.S. DISTRICT COURT
DISTRICT OF DELAWARE